

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Craig Bradley Deimler  
William Oliver Fisher-Deimler aka  
William Oliver Fisher Deimler fka  
William Oliver Fisher  
Debtor(s)**

**M&T Bank  
Movant**

**vs.**

**Craig Bradley Deimler  
William Oliver Fisher-Deimler aka William  
Oliver Fisher Deimler fka William Oliver Fisher  
Debtor(s)**

**Jack N. Zaharopoulos,  
Trustee**

**BK NO. 20-00841 HWV**

**Chapter 13**

**Related to Document No. 339**

**Hearing Date: 10/17/2023**

**RESPONSE TO MOTION TO SELL REAL ESTATE FREE AND CLEAR OF LIENS RE:  
ELMWOOD DRIVE PROPERTY**

M&T Bank enters its response to the Debtor's Motion to Sell Real Estate Free and Clear of Liens Re: Elmwood Drive Property.

1. Creditor's loan is secured by a mortgage on Debtor's property at 3205 Elmwood Drive, Harrisburg, PA 17110.
2. Creditor would not object to the sale so long as the Order entered is clear that the sale is not free and clear of secured creditors lien and same shall remain on the property until such time that it is paid in full.

WHEREFORE, the Movant, M&T Bank, prays that the Court enters an Order requiring the Secured Creditor to be paid in full.

Respectfully submitted,

Date: September 22, 2023

/s/ Brian C. Nicholas  
Brian C. Nicholas, Esquire  
[bnicholas@kmlawgroup.com](mailto:bnicholas@kmlawgroup.com)  
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aka William Oliver Fisher  
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**CERTIFICATE OF SERVICE  
RESPONSE TO MOTION TO SELL REAL ESTATE FREE AND CLEAR OF LIENS RE:  
ELMWOOD DRIVE PROEPRTY**

I, Brian C. Nicholas of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on September 22, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Craig Bradley Deimler  
2772 Monticello Lane  
Harrisburg, PA 17112

Attorney for Debtor(s) (via ECF)

John Matthew Hyams  
Law Offices of John M. Hyams  
2023 N 2nd Street  
Harrisburg, PA 17102

William Oliver Fisher-Deimler aka William  
Oliver Fisher Deimler fka William Oliver  
Fisher  
2772 Monticello Lane  
Harrisburg, PA 17112

Trustee (via ECF)

Jack N. Zaharopoulos  
Standing Chapter 13 (Trustee)  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail.

Dated: September 22, 2023

/s/ Brian C. Nicholas

Brian C. Nicholas Esquire  
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701 Market Street, Suite 5000  
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